

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>IAN SINCLAIR BUSH</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1029(a)(2) (use of unauthorized</b>
	<b>:</b>	<b>access devices – 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1028(a)(7) (possession and use</b>
	<b>:</b>	<b>of means of identification in connection</b>
	<b>:</b>	<b>with the commission of unlawful activity –</b>
	<b>:</b>	<b>1 count)</b>
		<b>18 U.S.C. § 1344 (bank fraud – 1 count)</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

Between on or about December 17, 2003 and on or about May 19, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

**IAN SINCLAIR BUSH**

knowingly and with the intent to defraud used, and attempted to use, unauthorized access devices, that is, credit accounts in the names of other persons, to obtain and attempt to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of at least \$67,356.20, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 1029(a)(2) and (b)(1).

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about February 26, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

**IAN SINCLAIR BUSH**

knowingly and without lawful authority possessed and used, and attempted to possess and use, a means of identification of another person with the intent to commit a violation of federal law, that is, access device fraud in violation of Title 18, United States Code, Section 1029(a)(2), by fraudulently opening a credit account in the name of B.B. with the store Saks Fifth Avenue in Bala Cynwyd, Pennsylvania, and by obtaining and attempting to obtain merchandise and other things of value totaling at least \$1,399.20, and thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1028(a)(7), (b)(1)(D), (c)(3)(A), (f).

### **COUNT THREE**

#### **THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

At all times material to this information:

1. First Union Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. From on or about October 4, 2000 through on or about October 11, 2000, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

#### **IAN SINCLAIR BUSH**

knowingly executed, and attempted to execute, a scheme to defraud First Union Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

#### **THE SCHEME**

3. Defendant IAN SINCLAIR BUSH deposited checks which he knew were worthless into accounts which he controlled with First Union Bank, and withdrew the funds before the victim bank was aware that the checks were worthless.

4. On or about October 5, 2000, defendant IAN SINCLAIR BUSH deposited a check for \$4,985.26 drawn on an account in the name of KJ into an account which he controlled in the name of BB with First Union Bank (hereafter "account number 1"), which check was returned on October 16, 2000 to First Union Bank unpaid because the KJ account was closed.

5. On or about October 6, 2000, defendant IAN SINCLAIR BUSH deposited a check for \$4,525.76 drawn on an account in the name of KJ into account number 1, which check was returned on October 13, 2000 to First Union Bank unpaid because the KJ account was closed.

6. On or about October 10, 2000, defendant IAN SINCLAIR BUSH deposited a check for \$4,750.25 drawn on an account in the name of KJ into account number 1, which check was returned to First Union Bank unpaid on or about October 16, 2000.

7. On or about October 6, 2000, defendant IAN SINCLAIR BUSH deposited a check for \$4,700.00 drawn on an account in the name of KJ into an account he controlled in the name of L&B with First Union Bank (hereafter "account number 2"), which check was returned to First Union Bank unpaid on or about October 13, 2000.

8. On or about October 9, 2000, defendant IAN SINCLAIR BUSH deposited a check for \$9,543.38 drawn on an account in the name of KJ into account number 2, which check was returned to First Union Bank unpaid.

9. On or about October 5, 2000, defendant IAN SINCLAIR BUSH deposited a check for \$4,850.75 drawn on an account in the name of KJ into an account at First Union Bank which he controlled in the name of BB (hereafter "account number 3"), which check was returned to First Union Bank unpaid on or about October 11, 2000 because the KJ account was closed.

10. Between or about October 4, 2000 and October 11, 2000, defendant IAN SINCLAIR BUSH transferred funds, withdrew funds, and paid for items using funds fraudulently credited to these accounts using the KJ checks drawn on closed accounts set forth above, resulting in a loss to First Union Bank of approximately \$16,272.18.

In violation of Title 18, United States Code, Section 1344.

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**PATRICK L. MEEHAN**  
**United States Attorney**